

Application No. 09/996,712  
Amendment Dated March 1, 2004  
Reply to Office Action of December 5, 2003

Attorney Docket No.: P-0289

### **REMARKS**

Claims 1-23 are pending in this application. By this Amendment, claims 1-4, 6-13 and 15-23 and the specification have been amended. Reconsideration in view of the above amendments and following remarks is respectfully requested.

#### **I. Objections**

The Office Action objects to the specification. Applicant respectfully submits that the above amendments obviate the grounds for the objection. Withdrawal of the objection is respectfully requested.

#### **II. 35 U.S.C. § 103(a)**

The Office Action rejects various combinations of claims 1-23 under 35 U.S.C. § 103(a) over Irube et al. (U.S. Publication No. 2001/0041586 A1 – hereinafter Irube) in view of Rossi et al. (U.S. Patent No. 5,672,820 – hereinafter Rossi), in further combination with Takahashi et al. (U.S. Patent No. 6,516,094 – hereinafter Takahashi), and Rudow et al. (U.S. Patent No. 6,236,940 – hereinafter Rudow). Because the combination of Irube and Rossi is improper, the rejection is respectfully traversed.

Application No. 09/996,712  
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**A. Claims 1-9**

Applicant respectfully submits that Irube discloses a communication terminal apparatus which includes, as illustrated in Fig. 3, a terminal main body 1 and a terminal direction sensor unit 35. A camera direction sensor unit 28 is also illustrated in Fig. 1.

In Irube, the camera direction sensor unit 28 detects the present/absence of an attached camera unit 4. In Irube, a first state is where the unit 4 senses the unit is located on the same side of the body 1 as the display surfaces of the video LCD 14 and text LCD 16. A second state is where the unit 4 senses it is located on the back side of the body 1 opposite to the side of the display surfaces of the video LCD 14 and the text LCD 16. See paragraph 0047 of Irube.

The terminal direction sensor unit 35, which is a mercury switch or the like, is also used to detect the direction or position of a terminal main body 1. See paragraph 0049 of Irube. The direction of the terminal main body 1 is referred to as either in landscape state, as illustrated in Fig. 3 where the body 1 is positioned with a long side horizontal, or rotated 90° from the landscape state in Fig. 3, which is referred to as portrait state where the body 1 is positioned with a long side vertical.

Therefore, in summary, the camera direction sensor unit 28 merely determines whether the camera unit 4 is on a front or back side from the side of the display surfaces of the video

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Attorney Docket No.: P-0289

LCD 14 and the text LCD 16. The terminal direction sensor unit 35 merely senses whether the terminal main body 1 is oriented on its side in landscape state or upright in portrait state.

Rossi discloses an object location identification system which includes a receiving module (RM), an angular measuring system (AMS) and a processor. The RM receives information specifying a user's location and provides RM output data in terms of latitude, longitude and altitude. The AMS would provide heading information, in terms of a compass heading. The Rossi device might also include a compass sensor 58 which would also be used to determine the heading at which the device is oriented.

The Office Action states that it would have been obvious to one having ordinary skill in the art at the time the invention was made to replace the camera direction sensor unit disclosed in Irube with the RM, AMS and compass sensor 58 taught by Rossi in order to obtain an apparatus that more precisely locates the direction of an object. Further, the Office Action asserts that "one would be motivated to do so since Irube is silent as to how the object location is determined." See page 3 of the Office Action dated December 5, 2003.

Applicant respectfully submits that it would not have been obvious to one of ordinary skill in the art, at the time of the invention, to replace the camera direction sensor unit or the terminal direction sensor unit of Irube, with the orientation or direction sensing devices of Rossi. Clearly, the Irube reference does not disclose or suggest any need for compass orientation

Application No. 09/996,712  
Amendment Dated March 1, 2004  
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Attorney Docket No.: P-0289

direction information. Likewise, the Rossi reference does not provide any motivation for such a combination. Applicant respectfully submits that it requires the impermissible use of hindsight in view of Applicant's own disclosure, to find a motivation for such a combination. For at least this reason, it is respectfully submitted that the combination is improper, and that all claim rejections should be withdrawn.

Takahashi and Rudow fail to cure the deficiencies of Irube and/or Rossi. Neither reference discloses or suggests, as recited in claim 1, an apparatus for displaying image data direction of a terminal including a direction sensor for detecting compass orientation, as well as the other features of claim 1. The references also fail to provide any motivation for selectively combining features of the devices discussed in these references to arrive at a device as recited in claim 1.

**B. Claims 10-23**

With respect to claim 10, in addition to the fact that the combination of Irube and Rossi is improper, all of the references fail to disclose or suggest at least the feature of a method for displaying image data direction of a terminal including demultiplexing an image frame received from a multiplexing processing unit and separating the frame into image, voice and compass orientation direction data. Additionally, with respect to claim 19, in addition to the fact that the

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Attorney Docket No.: P-0289

combination of Irube and Rossi is improper, all of the references also fail to disclose or suggest at least the feature of a method for displaying image data direction of a terminal including formatting a detected analogue compass orientation direction data into a binary value of a certain bite and encoding said binary value, along with the other features of claim 19.

**C. Conclusion**

For at least the reasons set forth above, Applicant respectfully submits that claims 1, 10 and 19 are allowable. Claims 2-9 depend from claim 1, claims 11-18 depend from claim 10 and claims 20-23 depend from claim 19, and are allowable for at least the same reasons, as well as their added features and the combinations thereof. Withdrawal of the rejection is respectfully requested.

Application No. 09/996,712  
Amendment Dated March 1, 2004  
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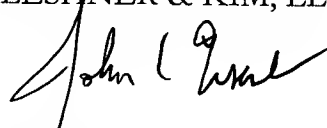
Attorney Docket No.: P-0289

**CONCLUSION**

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,  
FLESHNER & KIM, LLP



John C. Eisenhart, Esq.  
Registration No. 38,128

P.O. Box 221200  
Chantilly, VA 20153-1200  
703 766-3701 DYK/JCE/LLL:knv:par  
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